

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT
AND MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION
OF FINANCIAL GUARANTY INSURANCE COMPANY
FOR ATTENDANCE, PARTICIPATION AND OBSERVATION
OF NOVEMBER 15, 2017, OMNIBUS HEARING**

[Dkt. # 1514]

Financial Guaranty Insurance Company (“**FGIC**”), by and through its attorneys, Rexach & Picó, CSP and Butler Snow LLP, files this *Informative Motion of Financial Guaranty Insurance Company for Attendance, Participation and Observation of November 15, 2017, Omnibus Hearing* (the “**Motion**”). In support of the Motion, FGIC respectfully states as follows:

1. Jason W. Callen and María E. Picó intend to appear and speak on behalf of FGIC at the November Omnibus Hearing at the United States District Court for the Southern District of New York on the following items:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

- *Motion of National Public Finance Guarantee Corporation for Entry of an Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery* [Dkt. #1177].
 - *Joinder of Financial Guaranty Insurance Company to Motion of National Public Finance Guarantee Corporation for Entry of an Order Pursuant to Bankruptcy Rule 2004 Authorizing Discovery* [Dkt. #1334].
- *Joint Motion by the Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and the Mutual Fund Group for Order Authorizing Rule 2004 Examination* [Dkt. #1178].
 - *Joinder of Financial Guaranty Insurance Company to Joint Motion by the Ad Hoc Group of General Obligation Bondholders, Assured Guaranty Corp., Assured Guaranty Municipal Corp., and the Mutual Fund Group for Order Authorizing Rule 2004 Examination* [Dkt. #1335].
- *Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate the Recovery from Hurricanes Irma and Maria* [Dkt. # 1514].
 - *Debtors' Objection to Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate Recovery From Hurricanes Irma and Maria* [Dkt. #1581].
 - *The Official Committee of Retired Employees of the Commonwealth of Puerto Rico's Objection to Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate Recovery From Hurricanes Irma and Maria* [Dkt. #1585].

- *The Puerto Rico Fiscal Agency and Financial Advisory Authority's Objection to Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate Recovery From Hurricanes Irma and Maria* [Dkt. #1586].
- *Objection of Official Committee of Unsecured Creditors to Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate the Recovery from Hurricanes Irma and Maria* [Dkt. # 1602].
- *Omnibus Reply to Objections to Urgent Motion of Financial Guaranty Insurance Company Regarding Proposed 90-Day Stay of All Litigation to Facilitate the Recovery from Hurricanes Irma and Maria* [Dkt. #1664].

2. Further, Jason W. Callen and María E. Picó also intend to appear to respond to any matters raised by the Court or to any statements made by any party in connection with the above-captioned Title III proceedings or any adversary proceedings currently pending in the above-captioned Title III proceedings.

3. In addition, one or two additional representatives of FGIC may attend the November 15, 2017, Omnibus Hearing.

Dated: November 7, 2017

Respectfully submitted,

REXACH & PICÓ, CSP

By: /s/ María E. Picó

María E. Picó
USDC-PR 123214
802 Ave. Fernández Juncos
San Juan PR 00907-4315
Telephone: (787) 723-8520
Facsimile: (787) 724-7844
E-mail: mpico@rexachpico.com

BUTLER SNOW LLP

By: /s/ Martin A. Sosland

Martin A. Sosland (*pro hac vice*)
5430 LBJ Freeway, Suite 1200
Dallas, TX 75240
Telephone: (469) 680-5502
Facsimile: (469) 680-5501
E-mail: martin.sosland@butlersnow.com
Stanford G. Ladner (*pro hac vice* admission
forthcoming)
1700 Broadway, 41st Floor
New York, NY 10019
Telephone: (646) 606-3996
Facsimile: (646) 606-3995
E-mail: stan.ladner@butlersnow.com

Christopher R. Maddux (*pro hac vice* admission
forthcoming)

J. Mitchell Carrington (*pro hac vice* admission
forthcoming)

1020 Highland Colony Parkway, Suite 1400
Ridgeland, MS 39157
Telephone: (601) 985-2200
Facsimile: (601) 985-4500
E-mail: chris.maddux@butlersnow.com
mitch.carrington@butlersnow.com

Jason W. Callen (*pro hac vice*)
150 3rd Avenue, South, Suite 1600
Nashville, TN 37201
Telephone: (615) 651-6774
Facsimile: (615) 651-6701
E-mail: jason.callen@butlersnow.com

*Attorneys for Financial Guaranty Insurance
Company*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will notify case participants.

Respectfully submitted.

Dated: November 7, 2017.

Respectfully submitted,

/s/ María E. Picó
María E. Picó – USDC-PR 123214
Rexach & Picó, CSP
Ave Fernández Juncos 802
Miramar, San Juan, Puerto Rico 00907
mpico@rexachpico.com
Telephone: 787-723-8520
Facsimile: 787-724-7844

Attorney for Financial Guaranty Insurance Company